

01/11/2012

1237835 - R8 SDMS



Fw: Rico Argentine Mine Site - UAO Schedule Modification

Amelia Piggott to: Carol Pokorny

01/11/2012 02:29 PM

From: Amelia Piggott/R8/USEPA/US
To: Carol Pokorny/R8/USEPA/US@EPA

Carol,

FYI- Steve made a schedule adjustment pursuant to the UAO.

Thanks!

ap

Amelia Piggott
Enforcement Attorney
U.S. Environmental Protection Agency
Region 8
303.312.6410

----- Forwarded by Amelia Piggott/R8/USEPA/US on 01/11/2012 02:29 PM -----

From: Steven Way/R8/USEPA/US
To: "Brown, Anthony R (RM)" <anthony.brown@bp.com>
Cc: Amelia Piggott/R8/USEPA/US@EPA, "Yadon, Douglas" <Douglas.Yadon@aecom.com>, "Christner, Jan" <jan.christner@urs.com>, "Cohen, Adam" <Adam.Cohen@dgsllaw.com>
Date: 01/11/2012 02:22 PM
Subject: Rico Argentine Mine Site - UAO Schedule Modification

Hello Tony,

Attached is the modified schedule for the Rico Argentine Mine Site - Unilateral Administrative Order for Removal Action ("UAO") Docket No. CERCLA-08-2011-0005, March 23, 2011. Pursuant to the provisions in section XV of the Order, I have approved the work plan schedule changes as shown and extended the delivery and completion dates for several tasks based on the plans to perform certain tasks this year as outlined in my letter. These changes are shown in the attached Section 8 - Schedule table.

If you have any questions, please contact me. I look forward to meeting with you regarding the next phase of work.

Sincerely,

Steve



EPAScheduleModLtr-1-2012.pdfRico - ScheduleMod1-10-12.pdf

On-Scene Coordinator
Emergency Response Program (8EPR-ER)
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

Office: 303-312-6723



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR-SA

January 10, 2012

Mr. Anthony Brown
Atlantic Richfield Company
4 Centerpointe Drive
Project Manager, Mining La Palma, CA 90623-1066

Re: Rico Argentine Mine Site – Unilateral Administrative Order for Removal Action (“UAO”)
Docket No. CERCLA-08-2011-0005 – Schedule Modification

Dear Mr. Brown:

I am writing you to follow up with written confirmation of previously approved schedule modifications that Atlantic Richfield has requested. In addition, this letter addresses anticipated 2012 season work and the proposed schedule modifications discussed during our meeting on December 1, 2011.

Specifically, the October written request to extend the deliverable dates for Task F1 – Preliminary Water Treatment Technology Screening Report to November 30 and Task C1 – Repository Design and Operating Plan to December 31, 2011 are approved. Also in your October 4, 2011 letter you indicate that Task B3 – Pond Stability Analysis field work was scheduled to be completed in 2011; and the findings that were provided in a Technical Memorandum on December 31st. These proposed schedule changes are acceptable. The results of these investigations are intended to be used in the plans developed for the Embankment Armoring and the Pond Stability Upgrades, which are scheduled to be completed in 2012.

As EPA and Atlantic Richfield discussed on December 1 and presented in the December 16, 2011 letter from Atlantic Richfield, EPA has considered the request for an extension of the scheduled deliverable and work completion dates associated with the planned water treatment design and construction. The extensions being approved are shown in the attached modified schedule. Proposed modifications to the schedule will allow time in 2012 to perform temporary flow control and treatment critical to quantifying the contaminant loading from the Blaine Adit level and determine if management of the smaller but higher concentration flow is feasible and may provide more long-term effectiveness. The primary reasons for granting the extension are based on the 2011 investigation of the acid mine drainage sources and underground workings associated with the Blaine Adit level and Argentine Shaft and the geotechnical investigation findings. The opportunity exists in 2012 to temporarily isolate, quantify and treat specific sources of acid mine drainage traveling underground through workings reporting to the St Louis

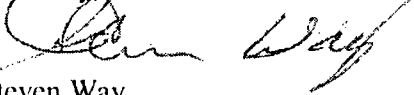
Tunnel discharge. In addition, controlling this flow is necessary to perform limited underground structural repair to the mine workings and to restore the underground flow path to the St. Louis Tunnel.

The above work will in turn assist with determining where it is most feasible to direct flows and which treatment alternatives are feasible for managing the ongoing releases from St. Louis Tunnel and associated mine workings. Following the above work to be completed in 2012, it is expected that the information will be available to determine if an alternative to a solely St. Louis Tunnel/Ponds lime addition water treatment system is feasible.

In addition, based on geotechnical evaluation of the potential water treatment solids repository locations, it was determined that additional locations need to be evaluated that may provide more stable conditions for long-term storage. Also, the modified dates for constructing the final solids repository are consistent with the modified schedule for water treatment operations.

While this schedule extension does not approve all of the dates requested by Atlantic Richfield, the modifications provided are appropriate based on the current conditions. The enclosed schedule (Section 8 of the Order) outlines the specific modifications to the schedule and tasks details that must be performed to meet the objectives associated with these changes.

Sincerely,



Steven Way
On-Scene Coordinator

Enclosure

cc: Amelia Piggott, 8ENI-L

Rico Argentine Mine Site – Unilateral Administrative Order for Removal Action (“UAO”)
Docket No. CERCLA-08-2011-0005 – Schedule Modification

Section 8.0 - Schedule (modified 1/10/12)		Submittal Due or Work to be Completed (or Started as Noted)
Task A - Pre-Design And Ongoing Site Monitoring		
A1	Ongoing Water Quality and Flow Monitoring Flow monitor installation Quarterly downloads	Completed Ongoing
A2	Seasonal Water Quality and Flow Monitoring SAP/QAPP First sampling event	Ongoing Completed Completed
Task B – Management of Precipitation Solids in the Upper Settling Ponds		
B1	Develop Initial Solids Removal Plan	Completed
B2	Drying Bed Construction, Solids Removal, and Solids Management Mobilization and site preparation Pond 18 solids removal Downstream ponds solids removal Start Complete Temporary repository – Construction complete Interim ponds solids management Permanent drying facility design Permanent drying facility construction	Completed Completed July 2012 November 2013 October 2012 October 31, 2014 January 31, 2014 November 30, 2015
B3	Pond Stability Analysis and Upgrades Pond stability analysis (Geotechnical and Hydrology) Embankment armoring Stability upgrades – structural	December 30, 2011 June 1, 2012 See Task F
Task C – Design and Construction of a Solids Repository		
C1	Develop a Repository Design and Operating Plan Site selection complete Submit Repository Design and Operating Plan Permitting (not required; anticipated timing)	September 2012 April 2013 January 31, 2014
C2	Solids Repository Construction and Initial Solids Placement Mobilization Construct repository Placement of dried Pond 18 solids Placement of downstream ponds solids	November 30, 2014 May 5, 2014 September 30, 2014 October 31, 2014 October 31, 2014
Task D – Hydraulic Control Measures for the Collapsed area of St. Louis Tunnel Adit		
D1	Adit Collapse Area Investigations Plan Adit and Portal Investigation Report Additional Investigation Preliminary Design Report	Complete December 30, 2011 September 2012 January 31, 2013

D3	Final Design and Construction of Adit Hydraulic Controls Final design Construction	January 31, 2014 November 28, 2014
Task E – Source Water Investigations and Controls (Assumes Blaine/Argentine Treatment)		
E1	Review Existing Data	Ongoing
E2	Additional Investigations Blaine water diversion Argentine Shaft flow/pump test (TBD) Pilot scale, temporary water treatment	October 31, 2012
E3	Evaluadon of Hydraulic Controls Alternatives	January 31, 2013
E4	Mine Water Source Controls - Design and Construction (Pending E3 Findings) Preliminary design and Additional Data Collection Final design Construction Start Complete and Operational	August 30, 2013 March 2014 June 2014 June 2015
TREATMENT ALTERNATIVES DECISION POINT		February 2013
Task F – Water Treatment System Analysis and Design (Assumes St. Louis Tunnel/Ponds based system)		
F1	Preliminary Water Treatment Technology Alternatives Screening Report	Received
F2	Treatment System Conceptual Designs and Additional Investigations Additional investigations/pilot scale testing Conceptual design	June – October 2012 March 2013
F3	30-Percent Design Report	July 2013
F4	Final Design and Construction of the Water Treatment Facility Final Design Construction and initial operation – Treatment Facility Start Complete Final design and construction of the flood dike and pond embankments improvements Final design Construction Start Complete	November 2013 June 2014 November 30, 2014 June 28, 2013 August 2013 November 30, 2014